

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DAMI SONG,

Plaintiff,

v.

DIRECTOR OF UNITED STATES  
CITIZENSHIP AND IMMIGRATION  
SERVICES,

Defendant.

Case No. 2:25-cv-00835-RSL

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND ORDER

For good cause, Plaintiff and Defendants, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until November 17, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act seeking an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Form I-829, Petition by Investor to Remove Conditions on Permanent Resident Status. USCIS’s response to the Complaint is currently due on July 14, 2025. The parties are currently working towards a resolution to this litigation.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to

control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

USCIS recently issued a Request for Evidence (“RFE”). Plaintiff has until September 18, 2025, to submit a response to the RFE. Once Plaintiff has submitted the response, USCIS will need time to review it and continue with processing of her application. Because further litigation may not be necessary after the review is completed, the parties agree that holding this case in abeyance through November 17, 2025, is appropriate. Therefore, the parties believe good cause exists for a stay in these proceedings to save the parties and this Court from spending unnecessary time and judicial resources on this matter.

Accordingly, the parties request that the Court hold the case in abeyance until November 17, 2025. The parties will submit a joint status report on or before November 17, 2025.

DATED this 2nd day of July, 2025.

Respectfully submitted,

TEAL LUTHY MILLER  
Acting United States Attorney

BUCHALTER PC (SEA)

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*Attorneys for Plaintiff*

*Attorneys for Defendant*

*I certify that this memorandum contains 289 words, in compliance with the Local Civil Rules.*

**ORDER**

The case is held in abeyance until November 17, 2025. The parties shall submit a status update on or before November 17, 2025. It is so **ORDERED**.

DATED this 3rd day of July, 2025.

  
ROBERT S. LASNIK  
United States District Judge